

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

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FELIPPE MARCUS,

Plaintiff,

v.

Case No. 20-cv-316-JLS-LGF

CITY OF BUFFALO, et al.,

Defendants.

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SUPPLEMENTAL ATTORNEY DECLARATION

David M. Lee, an attorney admitted to practice in this court, declares under penalty of perjury and pursuant to 28 U.S.C. §1746 that the following is true and correct:

1. I am an Assistant Corporation Counsel for the City of Buffalo, of Counsel to Cavette A. Chambers, Corporation Counsel and attorney for the defendants. As such, I am fully familiar with this matter.

2. This supplemental declaration is offered in further support of defendants' pending motion (72), insofar as the motion seeks an extension of time to respond to plaintiff's document requests.

3. On or about April 11, 2022, plaintiff served upon defendants a second request for documents (79).

4. For the reasons previously stated, defendants request permission to serve responses to plaintiff's second request for documents within thirty (30) days of the date of entry of the order disposing of the pending motion.

Dated: Buffalo, New York
April 21, 2022

s/David M. Lee

CERTIFICATE OF SERVICE

I certify that on April 21 2022, I caused the foregoing to be served upon plaintiff by regular mail addressed to Felipe Marcus, 3205 South Parker Road, Apt. 109, Denver, Colorado 80014.

Dated: Buffalo, New York
April 21, 2022

s/David M. Lee